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Attorneys for Third-Party Defendants
RAHI SYSTEMS, INC., PURE FUTURE
TECHNOLOGY, INC., MASOOD MINHAS aka
MIKE MINHAS, NAUMAN KARAMAT aka
NORMAN KARAMAT, KAROLINE BANZON,
NABIA UDDIN and KAEALYN NGUYEN

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CISCO SYSTEMS, INC., a California
corporation, and CISCO TECHNOLOGY,
INC., a California corporation,

Plaintiffs,

v.

ZAHID "DONNY" HASSAN SHEIKH, an
individual; SHAHID SHEIKH, an
individual; ROYA SHEIKH a.k.a. ROYA
SADAGHIANI, an individual; KAMRAN
SHEIKH, an individual; IT DEVICES
ONLINE, INC., a California corporation;
PUREFUTURETECH, LLC, a California
limited liability company; and JESSICA
LITTLE a.k.a. JESSICA MCINTOSH, an
individual personally and dba MCINTOSH
NETWORKS,

Defendants.

AND RELATED CROSS-ACTION.

Case No. 4:18-CV-07602-YGR

**DECLARATION OF TARUN RAISONI IN
SUPPORT OF THIRD PARTY
DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT, OR IN THE
ALTERNATIVE MOTION FOR
SUMMARY ADJUDICATION**

Date: July 31, 2020
Time: 2:00 p.m.
Dept.: Ctrm. 1, 4th Floor
Judge: Hon. Yvonne Gonzalez Rogers

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1 I, Tarun Raisonni, declare.

2 1. I am the CEO of Rahi Systems, Inc., ("Rahi") which is a Third Party Defendant in
3 the above captioned matter. I make this declaration of my own personal knowledge. If called
4 upon, I could competently testify as to the contents set forth herein.

5 2. Together with my co-founders, I started Rahi at the end of 2012. Since co-
6 founding Rahi, I have overseen all aspects of Rahi's operations. Rahi is a value added reseller
7 ("VAR") of electronics and IT equipment. Rahi also provides engineering services to help
8 customers design and configure equipment to their needs and Rahi also provides design and
9 implementation of cloud environments, data management and storage and software services.
10 Additionally Rahi manufactures server racks, cabinets and wire management systems. Rahi has
11 offices in the United States and 16 other countries. These capabilities allow Rahi to provide
12 logistics services to our customers, local engineering and support, and global product pricing,
13 among other services that are important to Rahi's existing and potential international clients.

14 3. Rahi has been a Cisco channel partner since 2013 and through Rahi's work and my
15 work prior to founding Rahi I have become familiar with Cisco's reselling practices and channel
16 partner program. As a channel partner, Rahi is an authorized reseller of Cisco products. This is
17 important because although genuine Cisco products can be obtained through unauthorized sellers,
18 also known as "gray market" purchasing, Cisco will not warranty products purchased from
19 unauthorized sellers. Customers who purchase Cisco products from gray market sellers are also
20 unable to obtain customer support services from Cisco and lack access to software and firmware
21 updates. Cisco channel partners also receive training from Cisco and engineering support, as well
22 as pricing discounts.

23 4. I have a Bachelor's degree in Chemical Engineering and a Master's degree in
24 Electrical Engineering, Computer Networks. I also hold a Diploma in Finance from the Hass
25 School of Business. Together with my co-inventors, I have successfully filed 4 patents. From
26 2000 to 2009, I worked for Cisco, where I was Senior Solutions Architect on the World Wide
27 Sales Advanced Technology Group. Immediately prior to starting Rahi, I was employed by
28 Emerson Network Power ("Emerson") as a Global Accounts Manager.

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1 5. It is from my work at Emerson that I first became aware of Defendant and Third
2 Party Plaintiff, Advanced Digital Solutions International, Inc. ("ADSI"), which is also a VAR.
3 ADSI was one of the accounts that I managed at Emerson and this is how I first met ADSI's
4 owners Shahid Sheikh, Roya Sadghiani and Third Party Defendants Masood ("Mike") Minhas.
5 During the course of my duties, I became familiar with ADSI's business and its capabilities. Over
6 time, I also met Nauman ("Norman") Karamat, Nabia Uddin and Karoline Banzon. Although I
7 became friends with Mike and Norman over time, I considered Nabia and Karoline to be
8 acquaintances. I do not recall Kaelyn Nguyen working at ADSI during the time that I worked for
9 Emerson, and I did not meet her in person until she interviewed for a position at Rahi in 2017,
10 although as Mike's assistant, I knew her name from seeing it on emails.

11 6. After I started Rahi at the end of 2012, I occasionally made purchases through
12 ADSI's commercial sales department. On occasion, ADSI also purchased products from Rahi. On
13 occasion, Rahi would also partner with ADSI in order to make sales to customers, for example,
14 Rahi provided customers with quotes for server racks Rahi manufactured. Because ADSI did not
15 have its own engineering staff or the capacity to provide customers with engineering support,
16 there were a few occasions when I visited customers with Mike in order to try to understand and
17 help ADSI arrive at an appropriate configuration based on the customer's needs and the products
18 sold by Rahi.

19 7. I have reviewed documents bates stamped as ADSI01519-1552, which I
20 understand ADSI produced in response to Third Party Defendants' Requests for Production of
21 Documents as allegedly supporting its claims against Third Party Defendants. With the exception
22 of documents bates stamped as ADSI01519-1521, 1534-1537, and 1552, I do not recognize the
23 documents encompassed within the ADSI01519-1552 range.

24 (a) I recognize documents ADSI01534 Redacted

25 [REDACTED]

26 [REDACTED]

27 [REDACTED]

28 [REDACTED]

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1 Redacted

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(b) I recognize document ADSI01535 Redacted

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(c) I recognize document ADSI01536 Redacted

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(d) I recognize document ADSI01521 Redacted

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(e) I recognize document ADSI01519-20 Redacted

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(f) ADSI01552 Redacted

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8. I understand that ADSI has also identified a series of documents relating to Mike

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and his company, Pure Future Technology, Inc. that were produced by Rahi in the pending

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Alameda County Superior Court matter, *ADSI v. Rahi Systems*, et al., Case No. RG 17881868 in

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which ADSI has alleged Rahi and the other Third Party Defendants misappropriated trade secrets

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consisting of client lists from ADSI when the individual Third Party Defendants left ADSI and

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1 began working at Rahi. I understand that ADSI has identified the following bates stamped
2 documents, Rahi 00001-2, 23, 108-111, 282-283 and 1271-1281. I have reviewed these
3 documents.

4 (a) Rahi00001-2 Redacted

10 (b) Rahi000023 Redacted

27 (c) Rahi000108-111 Redacted

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Redacted

(d) Rahi0000282-283 Redacted

(e) Documents bates stamped Rahi0001271-1280 Redacted

(f) Documents bates stamped Rahi 0001281 Redacted

9. Of the five individual Third Party Defendants who now work at Rahi, Karoline Banzon was the first to contact me in August 2017 about wanting to come work at Rahi. She indicated she wanted to leave ADSI because she was no longer comfortable with the company culture. She went through two interviews before we offered her a position.

10. I was subsequently contacted by Mike from whom I understood that he wanted to leave ADSI because he felt the company and in particular Shahid Sheikh and his sons were taking ADSI in the wrong direction, and then by Norman Karamat and Nabia Uddin. I also interviewed Kaelyn Nguyen at Mike's request because I understood he was concerned she would be fired once

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1 he left ADSI. I understand that Mike suggested that Kaelyn contact me, but I do not know what
2 he told her about whether he had accepted a position at Rahi.

3 11. I have never been party to any agreement with any other Third Party Defendant in
4 this matter, or any other person in order to cause ADSI to appear to purchase or purchase, or to
5 appear to sell or sell counterfeit Cisco products, nor have I permitted any such practices or
6 occurrences at Rahi.

7 12. Neither Rahi nor I receive any financial benefit from ADSI's sales of counterfeit
8 products. I do not consider ADSI to be a significant competition with Rahi: ADSI's business
9 model is what I would term a "box pusher" model. In other words, ADSI simply resells the same
10 products produced by the manufacturer without adding value, like engineering knowledge and
11 staff to develop and configure solutions for customer needs using the most appropriate product
12 available from a variety of manufacturers. Instead, it must rely on single manufacturer centric
13 solutions for whatever individual manufacturer's representative is able to assist it, or must require
14 the customer to develop its own solutions. I know this because of my work with ADSI as its
15 Emerson account representative and because I also provided engineering support to ADSI when it
16 was interested in selling Rahi manufactured server racks. ADSI is also not an authorized seller of
17 products like Cisco and NetApp, both of which make up a major part of Rahi's business.
18 Although I do not consider ADSI to be a significant Rahi competitor, logically any company that
19 sells counterfeits is at a unfair competitive advantage because it does not have the same costs to
20 purchase products and can sell products at lower prices to customers who believe they are getting
21 the real thing.

22 I declare under penalty of perjury under the laws of the United States of America that the
23 foregoing is true and correct.

24 Executed this 26th day of May, 2020 at Fremont, California

25
26 
27 _____
28 Tarun Raisoni